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June 2, 2017

Hon. Andrew L. Carter  
Judge of the U.S. District Court, S.D.N.Y.  
500 Pearl Street  
New York, New York 10007

**Re: Donoghue v. Patriot National, Inc. Et Al // 16 Civil 7905 (ALC)  
Request For Expansion Of Time To Restore Case To Calendar  
Or, In The Alternative, Restoration**

Your Honor:

I am one of plaintiff's counsel.

On May 3, 2017, Your Honor entered an Order of Discontinuance and allowing reinstatement of the case within 30 days on application. That period expires on June 2, 2017, today.

The parties have executed a Settlement Agreement And Release which will be executory until June 7, 2017, at which time stipulated payments are to be made. The lack of congruity between the period when reinstatement may be sought and the date when the settlement is scheduled to be fulfilled leaves the plaintiffs with an exposure I would like to eliminate.

For that reason I ask that the period during which reinstatement may be sought by application be extended to 40 days or until and including June 12, 2017; or, in the alternative, that restoration be made immediately with a retained right of the parties to dismiss after the settlement is implemented.

Very truly yours,

David Lopez

DL/el

Cc: All counsel via ECF